

*original*

TERRY KERR  
2895 WOODBRIDGE CIRCLE  
IDAHO FALLS, IDAHO 83401  
208-520-7266  
PRO-SE PLAINTIFF

COPY

IN THE DISTRICT COURT OF THE THIRTEENTH JUDICIAL DISTRICT  
OF THE STATE OF MONTANA, IN AND FOR YELLOWSTONE COUNTY

TERRY KERR, )  
 )  
 PLAINTIFF, )  
 )  
 -VS- )  
 )  
 ST. VINCENT HEALTHCARE, )  
 )  
 DEFENDANTS. )  
 )  
 \_\_\_\_\_ )

CASE NO. DV 15-0395  
RUSSELL C. FAGG  
COMPLAINT

COMES NOW PLAINTIFF PRO-SE TERRY KERR WHO COMPLAINS OF  
THE DEFENDANT, ST. VINCENT HEALTHCARE. THE HONORABLE JUDGE  
RUSSELL C. FAGG DID ORDER THAT THE PLAINTIFF TERRY KERR MUST  
SUBMIT HIS CASE TO THE MONTANA MEDICAL LEGAL PANEL FOR THEIR  
CONSIDERATION, AS PERM.C.A. 27-6-301 (2013). THE PLAINTIFF  
PRO-SE TERRY KERR DID FILE A CLAIM #1409 WITH THE MONTNANA  
MEDICAL LEGAL PANEL AND DID HAVE THE RQUIRED HEARING AND DID  
ALL THAT WAS ASKED OF HIM TO DO. SO THE ORDER OF THE HONORABLE  
JUDGE RUSSELL C. FAGG WAS COMPLETED AS REQUIRED. IN ADDITION  
THE PLAINTIFF PRO-SE ALSO DID FILE COMPLAINT #2014-MED-LIC-142  
AGAINST KEVIN J. BRUEN MD WITH THE MONTANA DEPARTMENT OF LABOR  
INDUSTRY AND LISENCING. ALSO THE PLAINTIFF PRO-SE TERRY KERR  
DID FILE A COMPLAINT #2014-NUR-LIC-186 AGAINST ESTELA KAUFMAN.  
BOTH OF THESE COMPLAINTS HAD HEARINGS IN HELENA, MONTANA AND THE

PLAINTIFF TERRY KERR DID GO TO THE HEARINGS IN HELENA. ALSO THE OTHER DEFENDANTS IN THE CASE, BANK OF AMERICA AND THE LAW FIRM GIVENS AND PURSLEY LLP. DID SETTLE WITH THE PLAINTIFF TERRY KERR. THE PLAINTIFF TERRY KERR DID RECIEVE A SETTLEMENT OF \$185,689.84 AND DID AGREE NOT TO INCLUDE THEM IN THE NEW LAW SUIT FILED BY THE PLAINTIFF.

SO, NOW PLAINTIFF TERRY KERR PRO-SE COMPLAINS ONLY OF THE DEFENDANT ST. VINCENT HEALTHCARE AS FOLLOWS:

JURISDICTIONAL ALLEGATIONS

1. PLAINTIFF IS AND AT ALL TIMES RELEVANT HERETO HAS AND IS A RESIDENT OF BONNEVILLE COUNTY, STATE OF IDAHO, BUT THE ACTION HAPPENED IN YELLOWSTONE COUNTY, STATE OF MONTANA ON THE DATES OF MARCH 8,9, AND 10, 2013, AT THE ST. VINCENT HEALTHCARE HOSPITAL AT 1233 NORTH 30th STREET, BILLINGS, MONTANA, 59101.

2. THE ST. VINCENT HEALTHCARE HOSPITAL IS THE PROXIMATE CAUSE OF THE INJURIES AND DAMAGES THAT HAPPENED TO THE PLAINTIFF IN THEIR CARE. THE DEFENDANTS DID NEGIGENTLY, WILLFULLY, MALICIOUSLY CONTRACTUALLY, AND OR ARE LEGALLY RESPONSIBLE FOR THE EVENTS AND HAPPENINGS THAT RESULTED IN INJURIES TO THE PLAINTIFF THAT AMOUNTED TO INTENTIONAL INFLECTION OF PHYSICAL AND EMOTIONAL MENTAL ANGUISH, THE PLAINTIFF WAS INTENTIONALLY SUBJECTED TO UNNECESSARY AND WONTON CALLOUS INFLECTION OF PAIN AND MENTAL ANGUISH BY THE ST. VINCENT EMPLOYEES WHO PROFITTED FROM THIS CRUEL AND PURPOSELY INFLECTED PAIN FOR FINANCIAL REWARD. ONE DOCTOR AT THE MONTANA MEDICAL LEGAL PANEL HEARING SAID (QUOTE) THE PICTURES OF THE INJURIES ARE HORRIFIC HOW DO YOU (ESTELLA KAUFMAN) EXPLAIN THE HORRIFIC PICTURES OF THE INJURIES TO TERRY KERR? SHE MADE THE TELLING OF LIES HER STORY. AT ONE POINT THE

EVIL NURSE KAUFMAN SAID THAT SHE PUT THE CATHITOR IN THE PLAINTIFF TERRY KERR. THEN TERRY KERR SAID THAT ANOTHER NURSE HELPED HER INSURT THE CATHITOR CAUSE SHE HAD TROUBLES, AND THE ARROGANT EVIL NURSE KAUFMAN SAID THAT IT WAS NOT A NURSE THAT HELPED HER , IT WAS JUST A TECK SUPPORT WOMAN. THEN THE PLAINTIFF TERRY KERR SAID WHICH IS THE TRUTH, YOU SAID YOU DID IT ALL BY YOURSELF AND NOW YOU SAY THAT A TECK WOMAN HELPED YOU? THIS FALLS UNDER THE ONE LIE ALL LIE DEFENSE.

3. BASED UPON THE INFORMATION AND FACTS THE PLAINTIFF ALLEGES THAT AT ALL TIMES HEREIN, THE DEFENDANT AND ITS EMPLOYEES WERE WERE ON A JOINT VENTURE AND WERE ENGAGED IN DOING CIVIL RACK-ETEERING FOR THE SOUL PURPOSE OF USING AN UNLAWFULL MEANS TO ACCOMPLISH A LAWFULL PURPOSE. THE DEFENDANT WAS PURPOSELY ACTING OUTSIDE THE SCOPE, THE COURSE, AND THE AUTHORITY OF THE LISENCED AGENCY PURPOSE.

#### STATEMENT OF THE ISSUES

4. THIS IS A PERSONAL INJURY LAWSUIT FOR INTENTIONAL INFLICTION OF PHYSICAL AND BODILY HARM TO THE EXTENT THAT EXCESSIVE CALLOUS AND EVIL DISREGARD FOR THE PLAINTIFF WAS EMPLOYED FOR THE CAUSE OF FINANCIAL REWARD. THESE INJURIES TO THE PLAINTIFF ARE VERY INCOMPATIBLE WITH THE EVOLVING STANDARDS OF DECENCY THAT MARK THE PROGRESS OF A MATURING SOCIETY. THE MANY ELEMENTS OF THE CONSPIRED CIVIL RACKETEERING WILL BE STATED WITH PARTICULARITY. THE CIRCUMSTANCES OF THE EVENTS WILL BE DOCUMENTED WITH FACTUAL MATERIALITY. THE OVERT ACTS WILL BE GIVEN IN EVIDENSE OF COMMON DESIGN TO PROVE THE SPECIFIC PURPOSE. THE PLAINTIFF WILL PROVE THAT THE DEFENDANT COMMUNICATED THE CONSPIRED CRIME BEING INTENTIONALLY DONE AND CAN PROVE ACTUAL MALICE WITH A SPECIFIC PURPOSE!

THE PLAINTIFF CAN PROVE THAT THE DEFENDANT COMMUNICATED THE CONSPIRED CRIME BEING INTENTIONALLY DONE AND CAN PROVE ACTUAL MALICE PERMITTING THE RECOVERY OF PUNITIVE DAMAGES. THERE ARE ACTUAL DAMAGES, FUTURE DAMAGES, AND PUNITIVE DAMAGES.

STATEMENT OF THE CASE

5. THIS CASE INVOLVES THE DEFENDANT ST. VINCENT HEALTHCARE PURPOSELY INJURING THE PLAINTIFF FOR FINANCIAL REWARD, WHICH THE PLAINTIFF CAN PROVE. THE STANDARD REMOVAL OF A BLOOD CLOT IN THE PLAINTIFFS LOWER LEG RESULTED IN A WRONGFULL PROCEDURE THAT GAVE THE PLAINTIFF A PURPOSEFULL HEART CONDITION AND DID NEARLY KILL THE PATIENT, WHICH WAS THE THE INTENT. CRIMINAL RACKETEERING AND EVIL BEYOND BELIEF.

STATEMENT OF FACTS

6. THE RISK MANAGEMENT DIRECTOR OF THE ST. VINCENT HOSPITAL SONYA BLENKER, THE EVIL NURSE ESTELLA KAUFMAN, AND THE DOCTOR OF EVIL KEVIN J. BRUIN M.D. DID CONSPIRE THE PLAINTIFFS DEATH AT ST. VINCENT HOSPITAL FOR PROFIT. THERE WAS LOTS OF INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS, LOTS OF INTENTIONAL INFLECTION OF PHYSICAL INJURY, COUPLED WITH EXTREME MALICE AND MISCONDUCT. THERE IS AN ABUNDANCE OF PROOF. LIKE THE ST. VINCENT ENCOUNTER REPORT. WHERE THE EVIL DOERS GAVE THE PLAINTIFF TERRY KERR 1000 UNITS OF HEPARIN, THEN 2000 UNITS OF HEPRIN, THEN WHEN THE HEART ATTACK GOT WORSE THEY GAVE HIM NITROGLYCERIN TO STOP THE HEART ATTACK. REMEMBER THE PLAINTIFF WAS IN THE HOSPITAL TO HAVE A SMALL BLOOD CLOT REMOVED FROM HIS LOWER LEG. INSTEAD OF SUCKING OUT THE BLOOD CLOT THEY DID A PROCEDURE TO MAKE THE BLOOD VIENS LARGER THAT REQUIRED THE HEART TO WORK EXTREMELY HARD CAUSING THE HEART ATTACK. THE REPORT SIGNED BY ESTELA KAUFMAN AND AUTHORIZED

BY KEVIN J BRUIN ON 3-09-2013. THEN WHEN NURSE KAUFMAN SIGNED OFF WHEN LEAVING THE SHIFT, SCOTT A. BRADY RN TOOK OVER FOR KAUFMAN. KAUFMAN SAID IN THE REPORT THAT THERE WAS NOT ANY BLEEDING AND WAS NOT BLEEDING. SHE SAID THE PATIENT IS COMPLAINING ABOUT LOSING BLOOD FROM THE PENIS BUT THERE IS NONE. THE NEW NURSE SCOTT A. BRADY IS SHOWN THE PLAINTIFFS CROTCH AREA WHERE THERE IS 3 UNITS OF BLOOD LOSS. THE PLAINTIFF TAKES SOME PICTURES OF THE BLOODY MESS AND INCLUDES SCOTT A. BRADY IN THE PICTURES. ALSO HAS SCOTT A. BRADY TAKE PICTURES OF THE BLOODY MESS THAT NURSE KAUFMAN SAYS THAT THERE IS NO BLOOD LOSS. THE PLAINTIFF SENDS THE PICTURES TO A PERSON WHO RECORDS THE PICTURES AND THEN THE PLAINTIFF ASKS SCOTT A. BRADY QUESTIONS AND RECORDS THE CONVERSATION. SCOTT A. BRADY ENCOUNTER REPORT SAYS THAT THE PATIENT HAS BLEEDING FROM THE TIP OF HIS PENIS THROUGHOUT THE REST OF THE NIGHT. PROVING KAUFMANS STORY IN THE ST. VINCENT ENCOUNTER REPORT WAS LIES. THIS RESULTED IN THE PICTURES THAT THE DOCTOR AT THE LEGAL HEARING CALLED HORRIFIC. THIS PROCEDURE WAS DONE TO A PERSON WHO HAD JUST GOT OUT OF THE HOSPITAL THE MONTH BEFORE FOR OPEN HEART SURGERY. THE PAIN WAS SO BAD FROM THE FORCEING OF BLOOD THREW THE SMALL VIENS THAT PAIN PILLS AND THE INTERVIENIOUS PAIN MEDICINE COULD NOT STOP THE PAIN. BUT KAUFMAN AND BRUIN WANTED THE CASH REWARD FOR THE PATIENTS DEATH OFFERED BY THE OTHER DEFENDANTS THAT SETTLED WITH THE PLAINTIFF. THE PRE OP DIAGNOSIS WAS CALLED A RIGHT FEM-PERONEAL BYPASS STENOSIS AND HX OF THROMBOSED POPLITEAL ARTERY ANEURYSM.

WHEN THE NEW DOCTOR SEEN THE PLAINTIFF 2 DAYS LATER HE WAS APPALLED BY WHAT HAPPENED. THE NEW DOCTOR IN ANOTHER STATE WHO EXAMINED THE PLAINTIFF STATED THAT THE BLOOD CLOT WAS STILL IN

WAS STILL IN THE LEG AND THE DISTAL SUPERFICIAL FEMORAL ON THE RIGHT LEG WAS TOTALLY OCCLUDED, AND THERE IS NO FLOW PAST THE POPLITEAL OR INTO THE TRIFURCATION ON THE RIGHT LEG LOWER LEG. THE PROXIMAL PORTIONS OF THE TIBIALS AND PERONEALS ON THE RIGHT LEG ARE COMPLETELY OCCLUDED. THE ANKLE TEST SHOWED 28 PERCENT BLOOD TO THE RIGHT FOOT. THE BLOOD TEST SHOWED A 3 UNIT LOSS OF BLOOD FROM THE TEST THEY DONE FROM THE WEEK BEFORE WHEN THEY CHECKED THE PLAINTIFF. THE PLAINTIFF WENT TO HAVE A SMALL BLOOD CLOT REMOVED AND NOW ALL THE ARTERIES AND VIENS ARE PLUGGED FROM THE PROCEDURE THAT BRUIN AND KAUFMAN DID. THEY MAY HAVE TO CUT OFF MY FOOT. THIS DOCTOR SAID HE WOULD TESTIFY IN COURT ABOUT THE OBORTION OF MEDICAL JUSTICE.

7. IT WAS ESTELLA KAUFMAN WHO PERPOSELY INJURED THE PLAINTIFF FOR FINANCIAL GAIN. SHE PURPOSELY RIPPED THE PLAINTIFFS BLADDER IN THE CATHITOR PROCEDURE AND INJURED HIS PENIS, ALSO THE PICUTRE OF THE DAMAGES FROM AN UNATHORRIZED XRAY THAT BURNED THE PLAIN-TIFF.

8 THE FLOOR NURSE TOLD MY SISTER THAT THE BLOOD CLOT HAD BEEN REMOVED AND THAT I WAS TELLING HER THAT IT WAS NOT REMOVED WAS WRONG. THEN DOCTOR BRUIN CAME BY AND I ASKED HIM TO TELL MY SISTER ABOUT THE BLOOD CLOT THAT HE TOOK OUT OF MY LEG. WHEN HE TOLD MY SISTER THAT THE BLOOD CLOT WAS NOT TAKEN OUT OF MY LEG MY SISTER ALSO SAID WHY IS MY BROTHER NO GETTING HIS MEDICINE ALL HE IS GETTING IS A BABY ASPRIN, NOT THE HEART DOCTORS MEDICINES? THE DOCTOR SAID HE WOULD LOOK INTO IT AND LEFT. I THEN SHOWED MY SISTER THE HUGE BLOOD LEEKS UNDER MY SKIN ON MY BACK LEGS ETC. SHE SAID GET YOUR THINGS WE ARE LEAVING. THEN WHEN I WAS LEAVING THE NURSE WHO LIED TO MY SISTER SAID THE DOCTOR MUST WRITE THE ORDER TO LEAVE AND DID SO HURRIEDLY. THE INSURANCE

MEDICARE DID NOT PAY THE BILL. THE NEW DOCTOR SAID THAT THAT WAS 2 LEG SURGERIES THAT DOCTOR BRUIN DID AND NEITHER WAS SUCESSFULL SO HE PUT ME ON PAD REHAB THERAPY AND INPROVED MY BLOOD FLOW TO THE LEG TO 53 PERCENT. THE PLAINTIFF HAS ISSUES EVER SINCE THE ATEMPTED MURDER AT THE ST. VINCENT HOSPITAL FOR FINANCIAL GAIN AND SPORT. THEY EVEN SOLD THE PLAINTIFFS BLOODY SHEETS. INJUSTICE ANYWHERE WILL LEAD TO INJUSTICE EVERYWHERE. THE PLAINTIFF WILL PREVAIL AT THE JURY TRIAL WITH AN ABUNDANCE OF EVIDENSE AND TEATIMONY FROM DOCTORS AND THE OTHER PARTICIPANTS IN THE CRIMINAL RACKETEERING AND MISCONDUCT CRIMES!

#### CONCLUSION

9. THE PLAINTIFF WILL PRESENT EVIDENSE TO SUPPORT HIS CLAIMS AGAINST THE DEFENDANT ST. VINCENT HEALTHCARE. THE DEFENDANT HAS SHOWN A DELIBERATE INDEFFERANCE TO THE HARMFULL CONSEQUENCES OF THIER CRIMINAL AND CIVIL RACKETEERING AND REPREHENSIBLE CONDUCT. THE PLAINTIFF DID OFFER TO SETTLE WITH THE DEFENDANT AND DID SEND THE DEFENDANTS ATTORNEY THE SETTLEMENT FROM THE OTHER TWO DEFENDANTS IN THE CASE BUT DID NOT WANT TO SETTLE CAUSE HE CAN MAKE A LOT OF MONEY FROM THE DEFENDANT ST. VINCENT HEALTH CARE OVER THE NEXT FEW YEARS.

#### FIRST CLAIM FOR RELIEF

10. PLAINTIFF ALLEGES, REALLEGES AND INCORPORATES BY REFFERENCE EACH AND EVERY ALLEGATION IN THE PRECEEDING PARAGRAPHS:

11. THE DEFENDANT DID KNOWINGLY VIOLATE THE PLAINTIFFS RIGHTS TO NOT BE HARMED INTENTIONALLY IN A HOSPITAL SETTING WHERE THE PLAINTIFF RECIEVED GRIEVIOUS INJURIES AT THE HANDS OF UNSCRUPOULOUS CRIMINAL DEFENDANTS. THEY NURSE KAUFMAN INJURED HIS PENIS PURPOSELY AND PURPOSELY INJURED HIS BLADDER CAUSEING THE PLAIN-

TIFF TO LOSE 3 UNITS OF BLOOD OUT HIS PENIS. THE NURSE KAUFMAN ALSO POKED HOLES INTO THE PLAINTIFFS ARTERIES PURPOSELY TO CAUSE LEAKS OF BLOOD UNDER THE PLAINTIFFS SKIN IN THE BYPASS STENOSIS, AND THE THROMBOSED POPLITEAL ARTERY ANEURYSM. THE PLAINTIFF HAS HORRIFIC PICTURES OF PROOF. THE DEFENDANTS KNEW THAT THIS WOULD HAPPEN IN THE ALLEGED BLOOD CLOT BUSTING PROCEDURE. THIS WAS AN CONSPIRED EVENT AND THE DEFENDANT KNEW THERE WOULD BE GRIEVIUS INJURIES AND HOPED FOR DEATH TO GET THE CASH REWARD OFFERED FOR THE PLAINTIFFS DEATH. THESE INTENTIONAL PHYSICAL INJURIES CAUSED THE PLAINTIFF SEVERE PHYSICAL MEDICAL DAMAGES THEREFORE THE PLAINTIFF ASKS FOR ACTUAL DAMAGES, FUTURE DAMAGES AND PUNITIVE DAMAGES.

SECOND CLAIM FOR RELIEF

12. THE BAD FAITH MISCONDUCT WITH THE GOAL OF MAKING SERIOUS PHYSICAL INJURIES COUPLED WITH THE INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS WILL CAUSE LASTING EMOTIONAL ISSUES LIKE POST TRAUMATIC STRESS. THE DEFENDANTS MADE THE PLAINTIFF WAIT A LONG TIME BEFORE TAKING HIM UP TO THE FLOOR WHERE HE WAS TO BE HOUSED. THEY HAD HIM RIDE IN AN ELEVATOR WITH A DEAD PERSON IN A BLACK BODY BAG FOR SPORT. THE CRIMINAL RACKETEERING ACTION COUPLED WITH THE CORUPTION ENTITLES THE PLAINTIFF TO AN AWARD OF ACTUAL DAMAGES, FUTURE DAMAGES, AND PUNITIVE DAMAGES.

THIRD CLAIM FOR RELIEF

13. THE DEFENDANTS KNEW THAT THE PLAINTIFF HAD HEART SURGERY AND WAS RELEASED FROM ANOTHER HOSPITAL FOR A HEART ATTACK JUST DAYS BEFORE THE WRONGFULL CLOT BUSTING PROCEDURE AND KNEW THAT HIS HEART WAS WEAK AND THAT HE COULD DIE FROM THE PROCEDURE, AND THEN THE DEFENDANT COULD GET THE CASH REWARD OFFERED FOR HIS

CONSPIRED DEATH! THIS WAS AN ILLEGAL AND UNLAWFULL ACTION TO ACCOMPLISH A SPECIFIC PURPOSE, THE DEATH OR DISABLEMENT OF THE PLAINTIFF. THEREFORE THE PLAINTIFF ASKS FOR ACTUAL DAMAGES, PUNITIVE DAMAGES, FUTURE DAMAGES, DAMAGES IN TORT FOR THE CONSPIRED PHYSICAL INJURIES AND EMOTIONAL GRIEF, LIKE HAVING TO GET YOUR FOOT CUT OFF BECAUSE OF THE MISCONDUCT AND CRIMINAL RACKETEERING.

FOURTH CLAIM FOR RELIEF

14. THE DEFENDANT ST. VINCENT HEALTHCARE DID LIBEL SLANDER THE PLAINTIFF TELLING HIS SISTER HE WAS OUT OF HIS MIND AND THE BLOOD CLOT WAS REMOVED FROM HIS LEG WHEN IT WAS NOT. THE NURSE WAS TRYING TO GET THE PLAINTIFFS SISTER TO HAVE HIM COMMITTED TO A MENTAL HOSPITAL CAUSE HE WAS OUT OF HIS MIND TELLING HIS SISTER ABOUT WHAT HAPPENED TO HIM. HIS SISTER FOUND OUT THE TRUTH AND TOOK HIM FROM THE VILLIANS BEFORE THEY COULD KILL HIM. THE LIABLE SLANDER WAS SO EXTREME THAT THE DEFENDANT NEEDS TO HAVE ITS SOUL WASHED AND SEE A EXORSIST. DUE TO THE SEVERE NATURE OF THE LIABLE SLANDERING BY THE DEFENDANT AND ITS EMPLOYEES, THE PLAINTIFF IS ASKING FOR ACTUAL DAMAGES, FUTURE DAMAGES, AND PUNITIVE DAMAGES, AND IN ADDITION COMPENSATORY DAMAGES.

FIFTH CLAIM FOR RELIEF

THE PLAINTIFF HAS SUFFERED FROM THE INTENTIONAL INFLICTION OF FINANCIAL DISTRESS. THE COSTS TO TRY TO HEAL TO INTENTIONAL CAUSED INJURIES PHYSICALLY AND EMOTIONALLY IS VERY COSTLY NOW AND FOR FUTURE MEDICAL COSTS LIKE HAVING HIS FOOT CUT OFF ETC. THESE INJURIES WERE CAUSED BY THE DEFENDANT FOR SPORT AND PROFIT. THERE IS AN IMPLIED COVENANT THAT A HOSPITAL SHALL BE A PLACE TO BE HEALED, NOT A PLACE TO BE INTENTIONALLY INJURED. THEREFORE

THE PLAINTIFF IS ASKING FOR COMPENSATORY DAMAGES, PUNITIVE DAMAGES, ACTUAL DAMAGES AND FUTURE DAMAGES.

PRAYER FOR RELIEF

WHEREFORE, THE PLAINTIFF PRAYS FOR JUDGEMENT AGAINST THE DEFENDANT AND ITS EMPLOYEES AS FOLLOWS:

- A. FOR A WRIT OF ATTACHMENT, WRIT OF GARNISHMENT, WRIT OF POSSESSION ATTACHING, GARNISHING, AND REAL PROPERTY OWNED BY THE DEFENDANT AND ITS EMPLOYEES.
- B. FOR A JUDGEMENT IN THE AMOUNT OF 30 MILLION DOLLARS AND OR AN AMOUNT TO BE DETERMINED AT THE JURY TRIAL.
- C. FOR COSTS OF THE SUIT.
- D. FOR POST JUDGEMENT INTEREST ON THE INTIRE JUDGEMENT TO BE DETERMINED AT THE JURY TRIAL AT THE LEGAL RATE.
- E. FOR SUCH OTHER AND FUTHER RELIEF AS THE COURT MAY DEEM APPROPRIATE IN THE PREMISES. AMAN.

DONE AND DATED THIS 5th DAY OF APRIL, 2015.  
BY PLAINTIFF PRO-SE TERRY KERR

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY THAT A COPY OF THE COMPLAINT WAS SENT TO THE DEFENDANTS ATTORNEY CHARLES K. SMITH, AT 1341 HARRISON AVE. P.O.BOX 2000, BUTTE, MONTANA, 59702, ON THIS 5th DAY OF APRIL, 2015. IT WAS SENT BY UNITED STATES MAIL PREPAID.

DONE AND DATED THIS 5th DAY OF APRIL, 2015

BY PLAINTIFF PRO-SE TERRY KERR